REMARKS/ARGUMENTS

Claims 1-73 and 75-98 are pending. Applicants have amended claim 1. Applicants thank the Examiner for his careful consideration of this application, and respectfully requests reconsideration, reexamination and allowance of the application.

Initially, Applicants note once again that the Examiner has apparently not returned an initialed copy of Form 1449 filed with Applicants' Information Disclosure Statement on March 12, 2002. If the Examiner requires a further copy of the IDS, Applicants' respectfully request that the Examiner contact Applicants' undersigned counsel of record.

The Examiner has rejected claims 1-7, 9-25, 27, 30-39, 41, 44-51, 53, 55-70, 73 and 91-96 under 35 U.S.C. Section 103(a) as allegedly being unpatentable over Lewis et al, U.S. Patent 6,233,565 ("Lewis") in view of Hayes, Jr., U.S. Patent 6,105,063 Independent claim 1 includes the following ("Hayes, Jr."). limitations: "a network coupled with the server system to provide support personnel, having a predetermined authorization level, access to the user account information; ... and a plurality of graphical interfaces for accessing the one or more databases in the server system via the network for enabling the and edit the user support personnel to review information, wherein access to certain information depends upon the predetermined authorization level." The other independent claims, namely claims 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97, contain similar or identical limitations.

The noted limitations, in combination with the other features of the claims, do not appear disclosed in Lewis. The

Examiner states that Lewis describes a proprietary website that is part of a server system maintained by an "RSP" or remote The Examiner then states that it would have service provider. been obvious that the RSP comprises personnel to maintain and operate the server. The Examiner provides an example, in which Lewis explicitly recites that the RSP servers are accessible only to systems administrators, with citation to col. 25, lines 42-52 of Lewis. However, the cited paragraph of Lewis teaches physically locking the servers in a guarded building having This teaching appears directed to restricted access. physical security of the device, such as location in a vault, as opposed to a system that provides a plurality of graphical interfaces for accessing one or more databases in the server system via the network for enabling the support personnel to review and edit the user account information, wherein access to certain information depends upon the predetermined authorization The "access" set forth in the claims is directed to level." information accessed through various graphical user interfaces via the network, as opposed to physical access to a locked building structure housing the servers. Accordingly, Lewis does not appear to disclose the claimed combination.

The other reference cited by the Examiner, namely Hayes Jr., discloses a system for client profile management in a client server system. It does not relate to a system that is directed to the printing of a value bearing item. Accordingly, even assuming some motivation to combine the references, critical elements of the claimed combinations are completely missing from the cited references.

In addition, claim 1, but not the other independent claims, has been amended to include the limitation of "a plurality of smartcards for restricting users from accessing certain graphical interfaces based upon the predetermined authorization level." This limitation is supported by the disclosure set forth, for example, on page 16, lines 5 through 9 of the originally filed specification. In addition to the arguments set forth above, the current limitation also appears to be missing from the cited references and provides additional grounds for allowance of at least claim 1.

The Examiner also made several other rejections based upon the combination of Lewis and one of a plurality of references Ιt is not clear whether the Examiner besides Hayes, Jr. intended to base the rejections on Lewis in view of Hayes, Jr. and further in view of the other relied upon references, or whether, as stated the rejections are directed to a combination of the Lewis reference and only one of the further references. In particular, the Examiner rejected claims 8, 26, 40 and 52 under 35 U.S.C. Section 103(a) as being unpatentable over Lewis in view of Kennedy, U.S. Patent 6,134,582; the Examiner rejected claims 71 and 72 under 35 U.S.C. Section 103(a) as being unpatentable over Lewis in view of Kara, U.S. Patent 6,233,5681; the Examiner rejected claims 28, 29, 42, 43 and 54 under 35 U.S.C. Section 103(a) as being unpatentable over Lewis et al., U.S. Patent 6,233,565 in view of Tanaka, U.S. Patent 6,385,654; and the Examiner rejected claims 75-90, 97 and 98 under 35 U.S.C. Section 103(a) as being unpatentable over Lewis in view of Remington, U.S. Patent 6,070,150.

As admitted by the Examiner, Lewis does not disclose or suggest a plurality of graphical interfaces for accessing the one or more databases in the server system via the network for enabling the support personnel to review and edit the user account information, wherein access to certain information depends upon the predetermined authorization level. none of the other individually relied upon references appear to provide the missing limitations, and therefore appear unsuitable bases for a rejection under 35 U.S.C. Section reconstruction of Applicants' invention based Hindsight Applicants' teachings is improper, as is reliance speculation, as opposed to actual disclosure in a relied upon reference, when considering the knowledge of one of ordinary skill in the art. Applicants note that none of the references relied upon by the Examiner appear to disclose or suggest the novel and unobvious combinations of elements and steps contained in Applicants' claims.

Applicants therefore respectfully submit that claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97 would not have been obvious in view of Lewis taken alone or in combination with the other references relied upon by the Examiner and are therefore allowable. Applicants further submit that all claims that depend directly or indirectly from the recited claims are also allowable.

Based on the foregoing, Applicants respectfully request allowance of the pending claims, and early issuance of a Notice of Allowance.

Respectfully submitted,
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